

**EXHIBIT B – DEFENDANTS’ JOINT PROPOSED CONSTRUCTIONS AND IDENTIFICATION OF SUPPORTING EVIDENCE****I. U.S. Patent No. 8,868,060**

	<b>Claim Term/Phrase</b>	<b>Defendants’ Proposed Construction</b>	<b>Supporting Evidence</b>
1	“accurate receipt: (Claim 15)	Indefinite <sup>1</sup>	<b>Intrinsic evidence:</b>  ’060 Patent claim 15 (8:18-41).  <b>Extrinsic evidence:</b>  Declaration testimony from Dr. Andrew court prefers, live testimony that the spec patent does not contain any guidance reg “accurate receipt” and as such, “accurate ambiguous. Such expert testimony will c result of this ambiguity, the claims are in because a person of ordinary skill would determine with reasonable certainty the s
2	“at least two specific identifiers . . . being for different types of emergencies” (claims 1, 7, 15)	“at least two specific identifiers each uniquely indicating a different type of emergency”	<b>Intrinsic evidence</b>  ’060 Patent claims 1 (6:18-38), 7 (6:56-7 Abstract, Fig. 1, Fig. 2, Fig. 5 , 2:29-49; 2 3:35-41; 3:46-52; 3:60-4:4; 4:12-15; 4:25 5:3; 5:14-16; 5:18-67; 6/26/2014 Respon Response.
3	“establishing at least one of a physical channel and a logical	“establishing at least one communication channel between the terminal and the base station”	<b>Intrinsic evidence:</b>  ’060 Patent claims 1 (6:18-38), 7 (6:56-7

<sup>1</sup> Defendants incorporate herein by reference their 7.10.2015 Joint P.R. 3-3 Invalidation Contentions.

	Claim Term/Phrase	Defendants' Proposed Construction	Supporting Evidence
	channel” (Claims 1, 7, 15)		Fig. 5, 3:41-46, 4:25-45, 4:65-5:12, 5:18-
4	“paging message” (Claims 1, 7, 15)	“a message sent by a base station on a shared channel and carrying information corresponding to unique identifiers”	<b>Intrinsic evidence:</b>  ’060 Patent claims 1 (6:18-38), 7 (6:56-7 Abstract, Fig. 1, Fig. 2, Fig. 5, 1:18-20; 2 3:8, 3:33-55, 3:60-4:15, 4:56-62, 4:65-5:
5	“storing, at the terminal of the cellular wireless communications system, a group of specific identifiers” (Claim 1)	“store [/storing], at the terminal, a plurality of specific identifiers prior to receipt of the paging message”	<b>Intrinsic evidence:</b>  ’060 Patent claims 1 (6:18-38), 7 (6:56-7 Fig. 4, Fig. 5, 3:23-27, 3:33-55, 4:35-55,
	“store a group of specific identifiers” (Claims 7, 15)		
6	“temporary mobile subscriber identity” (Claims 1, 7, 15)	“a temporary identifier allocated to the terminal to uniquely identify the mobile subscriber”	<b>Intrinsic evidence:</b>  ’060 Patent claims 1 (6:18-38), 7 (6:56-7 Fig. 4, Fig. 5, 3:23-27, 3:33-55, 4:16-19, 5:63-67.  <b>Extrinsic evidence:</b>  3GPP TS 23.003 V7.1.0 (September 200

**II. U.S. Patent No. 8,848,556**

	<b>Claim Term/Phrase</b>	<b>Preliminary Proposed Construction</b>	<b>Supporting Evidence</b>
1	“a bitmap indicating which power headroom reports are being reported” (Claims 13, 21)	“a collection of bits indicating which power headroom reports are being reported”	<b>Intrinsic evidence:</b>  ’556 Patent claims 13 (9:23-38) and 21 (9:23-38), Fig. 3, Fig. 5, Fig. 6, Fig. 7, 2:1-3, 2:21-22, 2:62-66, 3:6-8, 3:18-20, 3:61-4:6, 5:4-35, 6:31-7:16.
2	“bitmap” (Claim 13, 14, 21, 22)	“a collection of bits”	<b>Extrinsic evidence:</b> New Oxford American Dictionary, 3 <sup>rd</sup> Edition (definition of “bitmap”)  Microsoft Computer Dictionary, 5 <sup>th</sup> Edition (definition of “bitmap”)  Oxford Dictionary of Computing, 6 <sup>th</sup> Edition (definition of “bitmap”)
3	“bits for power headroom reports for a plurality of [the] secondary cells.” (Claims 13, 21)	“bits for power headroom reports for a plurality of secondary cells in a configuration such that a single bit in the bitmap does not correspond to a single secondary cell”	<b>Intrinsic evidence:</b>  ’556 Patent claims 13 (9:23-38) and 21 (9:23-38), Fig. 3, Fig. 5, Fig. 6, Fig. 7, 2:1-3, 2:21-22, 2:62-66, 3:6-8, 3:18-20, 3:61-4:6, 5:4-35, 6:31-7:16, Response dated July 15, 2014
4	“secondary cells” (Claims 13, 21)	“serving cells/component carriers configured for a UE that are different from the primary serving cell”	<b>Intrinsic evidence:</b>  ’556 Patent claims 13 (9:23-38) and 21 (9:23-38), Fig. 6, Fig. 7, 1:14-26, 1:41-62, 3:64-4:2, 4:7-11, 5:23, 5:30-35, 6:40-62, 7:6-23.

	Claim Term/Phrase	Preliminary Proposed Construction	Supporting Evidence
5	“type 1 power headroom report” / “type 2 power headroom report” (Claims 15, 23)	Indefinite <sup>2</sup>  If not indefinite:  “type1 power headroom report” should be construed as “a power headroom report computed as: P <sub>cmax,c</sub> minus PUSCH power”  ”type 2 power headroom report” should be construed as “a power headroom report computed as: P <sub>cmax,c</sub> minus PUCCH power minus PUSCH power”	<p><b>Intrinsic evidence:</b></p> ’556 Patent claims 15 (9:43-47) and 23 (5:51-55, 6:56-62; 7:17-23). <p><b>Extrinsic evidence:</b></p> Declaration testimony from Dr. Andrew t court prefers, live testimony that the spec patent does not contain any guidance reg between the terms “Type1 power headro “Type2 power headroom report” and, acc what distinguishes these two terms from headroom reports other than the specific claims 16 and 24 as “further limitations.” will support that the terms “type 1 power “type 2 power headroom report” are amb testimony will demonstrate that as a resul the claims are invalid as indefinite becaus ordinary skill would not be able to determ certainty the scope of the claims.

<sup>2</sup> Defendants incorporate herein by reference their 7.10.2015 Joint P.R. 3-3 Invalidity Contentions.

**III. U.S. Patent No. 8,385,966**

	<b>Claim Term/Phrase</b>	<b>Preliminary Proposed Construction</b>	<b>Supporting Evidence</b>
1	“preamble power” (Claims 1, 2, 5, 9-11, 14)	“a transmit power of a preamble sent on an access channel”	<b>Intrinsic evidence:</b>  6:18-26; 9:65-10:25; 10:49-60; 11:25-31; 13:47-62)  3GPP TS 36.213 V8.2.0 (2008-03-20)  3GPP TS 36.300 V8.4.0 (2008-03-20)
2	“wherein the first power control adjustment state $g(i)$ for $i=0$ is initialized as: $P_{O\_UE\_PUCCH} + g(0) = \Delta P_{PC} + \Delta P_{rampup}$ ” (Claims 3, 12)”	“wherein $g(0)$ is calculated from the values of $P_{O\_UE\_PUCCH}$ , $\Delta P_{PC}$ , and $\Delta P_{rampup}$ by calculating a sum of $g(0)$ and $P_{O\_UE\_PUCCH}$ and a sum of $\Delta P_{PC}$ and $\Delta P_{rampup}$ and equating the two calculated sums”	<b>Intrinsic evidence:</b>  ‘966 Patent Claims 3 (13:36-42), 4 (13:43-44) and 13 (15:33-36), FIG. 3, FIG. 4, 3:14-50, 6:46-49, 6:58-7:45, 10:9-25, 10:61-67, 11:25-31, Non-final Rejection of October 3, 2011 and Rejection of May 18, 2012 at pages 8-9, August 21, 2012.  <b>Extrinsic evidence:</b>  Declaration testimony from Dr. Andrew H. Lee, the court prefers, live testimony concerning how a person of ordinary skill would understand reference numeral 13 in particular explaining the equation found in claim 13 and supporting that a person of ordinary skill in the art of power control for wireless device technology would understand the claimed term to mean “wherein $g(0)$ is calculated from the values of $P_{O\_UE\_PUCCH}$ , $\Delta P_{PC}$ , and $\Delta P_{rampup}$ by calculating a sum of $f(0)$ and $P_{O\_UE\_PUCCH}$ and a sum of $\Delta P_{PC}$ and $\Delta P_{rampup}$ and equating the two calculated sums”

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